

Paul Swenson Prior, Esq.
Nevada Bar No. 9324
Alexis R. Wendl, Esq.
Nevada Bar No. 15351
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
Email: sprior@swlaw.com
awendl@swlaw.com

Attorneys for Defendant Secure Source International, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DONALD WILLIAMS,
Plaintiff,

v.

SECURE SOURCE INTERNATIONAL,
LLC; DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,
Defendant.

Case No. 2:21-cv-01900-JCM-NJK

**STIPULATION AND ORDER FOR
REMAND**

Plaintiff Donald Williams (“Plaintiff”) and Defendant Secure Source International, LLC (“Defendant”) (collectively, the “Parties”), through their respective counsel of record, hereby stipulate as follows:

On September 13, 2021, Plaintiff filed his Complaint in the Eighth Judicial District Court, Clark County, Nevada, Case No. A-21-840960-C, bearing the above caption.

On October 14, 2021, Defendant filed a Petition for Removal to the United States District Court for the District of Nevada on the basis that Defendant contended that this Court has diversity jurisdiction over this case under 28 U.S.C. 1332(a) [ECF No. 1].

After receiving the Petition for Removal, Plaintiff requested that Defendant stipulate to remand the case, on the basis that no diversity jurisdiction exists because Plaintiff’s damages do

not exceed \$75,000.00—the jurisdictional threshold for purposes of diversity jurisdiction. Should the circumstances change, then Defendants reserve its rights under 28 U.S.C. 1332(a).

Plaintiff acknowledged that he does not anticipate the amount in controversy to exceed \$75,000.00. Accordingly, Defendant agrees that the case lacks the amount in controversy to remain in the federal court. This agreement is made in reliance upon this stipulation and the representations made by Plaintiff's counsel regarding the amount in controversy in this matter.

Accordingly, the Parties hereby stipulate as follows and request that the Court enter the proposed order filed herewith:

1. It is anticipated that the total amount of damages, if any, recoverable by Plaintiff in this action against Defendant will not exceed Seventy-Five Thousand Dollars (\$75,000.00), inclusive of all damages claims, including punitive damages claims, if any.

2. Because the amount in controversy for this case do not appear to exceed \$75,000.00, this action be hereby remanded to the Eighth Judicial District Court for Clark County, Nevada.

3. Each party shall bear their own costs and attorneys' fees associated with the removal and this remand.

IT IS SO STIPULATED.

Dated: October 29, 2021

Dated: October 29, 2021

SHAUN ROSE LAW LLC

SNELL & WILMER L.L.P.

By: /s/ Shaun M. Rose

By: /s/ Paul Swenson Prior

Shaun M. Rose, Esq.
Nevada Bar No. 13945
9505 Hillwood Dr., Suite 100
Las Vegas, NV 89134

Paul Swenson Prior, Esq.
Nevada Bar No. 9324
Alexis R. Wendl, Esq.
Nevada Bar No. 15351
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

*Attorney for Plaintiff Donald
Williams*

*Attorneys for Defendant Secure Source
International, LLC*

ORDER

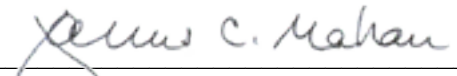
Upon stipulation of the Parties and good cause appearing therefor, it is hereby ORDERED, ADJUDGED, and DECREED as follows:

1. The amount in controversy in this action does not appear to exceed \$75,000.00; and

2. Effective immediately, these proceedings are hereby remanded to the Eighth
Judicial District Court for Clark County, Nevada.

IT IS SO ORDERED.

DATED: November 4, 2021.


UNITED STATES DISTRICT COURT JUDGE

Respectfully submitted by:

SNELL & WILMER L.L.P.

By: /s/ Paul Swenson Prior
Paul Swenson Prior, Esq.
Nevada Bar No. 9324
Alexis R. Wendl, Esq.
Nevada Bar No. 15351
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

Attorneys for Defendant Secure Source International, LLC

4871-0788-5057

Snell & Wilmer
LLP
LAW OFFICES
50 West Liberty Street, Suite 510
Reno, Nevada 89501
775-785-5440